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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

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Keith Raniere,

Plaintiff,

- v -

Case No. 4:22-cv-00561-RCC

Merrick Garland, et. al.,

Defendants.

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MOTION TO REQUEST EXTENSION OF DEADLINE
TO FILE RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

1. Plaintiff Keith Raniere, through his undersigned counsel, hereby moves to request the Court for an order granting a reasonable extension of the deadline to submit a Response in Opposition to Defendants' Motion for Summary Judgment related to the above-captioned case, which is currently due on November 16, 2023, to December 18, 2023 or any date thereafter that the Court deems acceptable.

2. Mr. Raniere's incarceration poses logistical challenges to enable him to easily participate with our office in the drafting of his response. To that end, although we have attempted to contact Mr. Raniere to discuss a draft of our Response, we continue to find it very difficult to reach and communicate with our client, and, as such, we have not yet had an

opportunity to discuss its contents in its entirety with him. We feel it is imperative to do so before filing. As such, we are requesting an additional adjournment to file our Response.

3. This extension is sought to afford additional time for the undersigned counsel to engage in consultation with Plaintiff regarding the filing of his Response. Although this is the fourth request by the undersigned counsel on behalf of Plaintiff for an extension to file a Response in Opposition to Defendants' Motion for Summary Judgment, we feel it necessary considering his current circumstances and the difficulties they pose to facilitating attorney-client communication.

4. We were informed that Mr. Raniere has been placed in involuntary protective custody and we have not been able to get access to him since November 1, 2023. Additionally, prior to November 1st and since the last extension, we were not provided with sufficient access to Mr. Raniere. We therefore, have not had adequate access nor time to discuss the case with him. Therefore, the undersigned counsel respectfully requests the Court for a reasonable extension to file the Response.

5. Based on the foregoing, Plaintiff respectfully requests the date to file his Response in Opposition to Defendants' Motion for Summary Judgment be extended to December 18, 2023, or any date thereafter that the Court deems convenient.

Date: November 15, 2023

Respectfully submitted,

/s/ Arthur L. Aidala
Arthur L. Aidala, Esq.
Attorney for Plaintiff

Delivered via ECF
to all Registered Parties